

Data Innovation Initiative

*Presented by Telogical
Systems*

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Telogical Systems

An Introduction

Description: Telogical Systems is the U.S. telecom and cable industry's trusted partner for competitive pricing information.

Founded: August, 2000

Headquarters: McLean, VA

Mgt Team:

- Andrew Woessner, President & CEO
- Gray Somerville, Co-Founder and VP of Client Services
- Ken Archer, Co-Founder and Chief Technology Officer

Type: Private

Employees: 50+ F/T; 10+ P/T

Clients: The "Who's Who" of the telecom and cable industry, including the top eight telco & cable service providers

Data Innovation Initiative

*Presentation of Telogical's
Comment*

Telecommunications service pricing information is integral to the FCC's efforts in the realms of:

1. Consumer Protection
2. Broadband Availability

As a result, the FCC must begin to collect pricing data and report on its effect on the industry.

The pricing data collected must be timely and lend itself to useful analysis.

The formulation and enforcement of consumer policies is facing new challenges for lack of accessible pricing data.

There are two areas where pricing data can provide insight into enforcement and policy making:

1. Early Termination Fees
2. Bill Shock

Early Termination Fees

The FCC needs a neutral and unbiased source for ETF data to protect consumers from unreasonable and confusing wireless terms.

1. The New America Foundation commented that “Service providers overpromise on the capabilities of their service and routinely fail to disclose limitations to services and hidden fees. This leads to substantial consumer confusion and frustration when choosing among service providers plans, assessing the actual speeds and quality of broadband service, and the actual cost of a service.” The New America Foundation Comments, p. 4)
2. Professor Rob Friedan's comments cited that “One of the dirtiest tricks played on American consumers is the way their country’s mobile-phone companies force them to use phones sold through the companies’ stores, then lock them into two-year contracts with punitive cancellation fees.” (Going, Going, Gone, supra note 27. from Professor Rob Frieden’s Comments)

Bill shock, a common subject of inquiry by consumers, is increasing with the growing complexity of communications plans.

1. Free Press commented that “the public is being artificially denied access to information they should by any reasonable account have access to.” (Free Press Comments, p. 7)
2. The New America Foundation commented that “Consumers have limited or no access to a wide range of service aspects, including typical services prices, usage limits and fees, actual performance and imposed limitations, and other contract terms.” The New America Foundation Comments, p. 4)

Real availability of broadband, as has been recognized by the FCC, is only possible at reasonable, non-prohibitive rates. Pricing data is integral in defining service affordability and availability.

1. Free Press commented that “Broadband subscribership and availability, along with speed and price, represent the most basic information concerning broadband.” (Comments of Free Press, p. 5)
2. The New America Foundation commented that “Vital information on broadband service offerings should be available upfront before the consumer purchases the service.” (The New America Foundation Comments, p. 6)

Pricing Data Specifications

We have identified four specifications that we believe are critical to enabling smarter policy and enforcement, informed by pricing data:

1. Structure
2. Schema
3. Detail
4. Aggregation

Structured data can help consumers and the FCC alike easily understand the complexity of service offerings.

1. The New America Foundation commented that “A standard form allowing consumers to compare apples to apples among providers is essential to promoting competition in broadband services.” (The New America Foundation Comments, p. 5)
2. The National Cable and Telecommunications Association commented that “collections are highly labor-intensive, requiring cable system personnel to devote significant time to collecting and entering the requested data.” (The National Cable and Telecommunications Association, p. 3)
3. Google commented that “the commission should make data easily accessible by consumers... through a functional web-based ‘dashboard’ to evaluate and compare wireline and wireless broadband service offerings.” (Google Reply Comments, p. 5)

Comparisons of prices across service providers – a key element in analyzing telecom competition – requires that all prices be stored in a single, shared schema.

1. The United States Telecom Association commented that “it is the presence of vigorous competition – not the filing of outdated reports – that protects consumers and ensures that rates are just and reasonable.” (The United States Telecom Association Reply Comments, p. 3)
2. Verizon commented that “the Form 477 interface be redesigned so that each filer has the option to fill in the information for all parts of all applicable states and then upload the information as one data file.” (Verizon Comments, p. 8)
3. Google commented that “the Commission should, to the maximum extent possible, publish data in user-friendly, machine-processable formats.” (Google Reply Comments, p. 5)

The growing complexity of communications prices is usually found in details such as promotions as well as terms, conditions and fees found in fine print.

1. Verizon comments that “Cable providers themselves-as well as popular media sources - also publish on their websites and elsewhere, information that is more relevant to video products and consumer purchasing decisions [than that found in forms 333 and 325].” (Verizon Comments, p. 6)
2. The United States Telecom Association commented that “telecommunications markets are changing dramatically, particularly as competitors bring new networks and service bundles to market.” (The United States Telecom Association Reply Comments, p. 1)
3. The New America Foundation commented that “Terms of service for service offerings are often hidden in legal verbiage, small text size, or non-prominent placement compared to other aspects of the service offering.” The New America Foundation Comments, p. 10)

The critical requirement of any pricing data - in order avoid confidentiality concerns - is that it be available at multiple levels of aggregation.

1. AT&T commented that, “in improving its data dissemination processes, the Bureau must ensure that it continues to protect highly confidential data. Inappropriate disclosure of such data could adversely impact, and significantly so, the ability of a provider to compete in the telecommunications market, particularly in the broadband market.” AT&T Comments, p. 5)
2. The United States Telecom Association commented that “Ultimately, it is the presence of vigorous competition – not the filing of outdated reports – that protects consumers and ensures that rates are just and reasonable.” (The United States Telecom Association Comments, p. 3)

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Open Discussion